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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

BRENDA KAY NORDENSTROM,
personal representative for the Estate of
Bryan Perry, Deceased; and BRENDA
KAY NORDENSTROM, an individual,

Plaintiff,

v.

CORIZON HEALTH, INC., a Tennessee
Corporation; CLACKAMAS COUNTY,
an Oregon county; JANA RACKLEY, an
individual; CAMILLE VALBERG, an
individual; NADIA PETROV, an
individual; ALEX SALAZAR, M.D., an
individual; SHAWN SHULTZ, an
individual; BENJAMIN LEFEVER, an
individual; MATT SAVAGE, an
individual; RICKY PAURUS, an
individual; LACEY SANDQUIST, an
individual; RICHARD TAYLOR, an
individual; NICK JOHNSON, an
individual; MATRONA SHADRIN, an
individual; and JOHN DOES 1-10,

Defendants.

Case No.: 3:18-cv-01754-HZ

**DECLARATION OF NADIA DAHAB IN
SUPPORT OF PLAINTIFF'S
RESPONSES IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT**

I, Nadia Dahab, upon my personal knowledge, submit this declaration pursuant to 28 U.S.C. § 1746, in support of Plaintiff's Responses in Opposition to Defendant Clackamas County, the Individual County Defendants, and the Corizon Defendants' ("Defendants") Motions for Summary Judgment.

1. I am attorney in good standing with the Oregon State Bar and counsel for Plaintiff in the above-captioned matter. I have personal knowledge of the following facts and, if called to testify, I could and would competently do so.

2. In support of Plaintiff's Responses in Opposition to Defendants' Motions for Summary Judgment, I hand-delivered to the U.S. District Court a USB flash drive containing 11 video files in .MP4 format. The videos were produced by Defendants in the above-captioned matter and converted to .MP4 format for submission to the Court.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 20th day of January, 2021.

/s/ Nadia H. Dahab

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